

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MICHAEL A. CARDOZO
Corporation Counsel

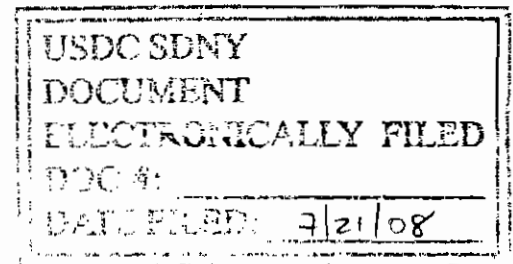
JOHANA V. CASTRO
Assistant Corporation Counsel
phone: (212) 788-0976
fax: (212) 788-9776
email: jcastro@law.nyc.gov

July 17, 2008

MEMO ENDORSED

BY HAND

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007



Re: Tamika Hughes v. City of New York, et al. 07-CV-9677 (DLC)(KNF)

Dear Judge Cote:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the above-referenced case. I am writing on behalf of the parties to respectfully request that the deadline for fact discovery be enlarged by sixty (60) days, from July 25, 2008 until September 23, 2008. This is the parties' first request for an enlargement of discovery in this action.

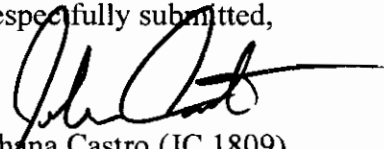
Fact discovery is currently scheduled to close in this matter on July 25, 2008. The enlargement of the discovery deadline is necessary so that the parties can continue document discovery as well as conduct deposition discovery. The undersigned notes that she is scheduled to commence trial in a matter entitled Lajzer Grynsztajn v. City of New York et al., 07-CV-6285 (MGC), which pending in the Southern District of New York before the Honorable Judge Cedarbaum, beginning on July 23, 2008; and therefore, will be heavily engaged in trial preparation in the coming days and unable to complete depositions in the instant matter.

Moreover, the parties are amenable to settlement, therefore the additional time would allow us to continue exploring the potential resolution of this case through settlement. On May 13, 2008, the parties appeared for a settlement conference before the Honorable Kevin Nathaniel Fox. Although the matter was not resolved at that time, the parties have since continued to discuss settlement and are still hopeful that they may be able to resolve the matter. Should we be unable to resolve the case through settlement, the additional time would enable the parties to complete document and deposition discovery.

Accordingly, for the reasons set forth herein, the parties respectfully request that the Court grant a sixty (60) day enlargement of time for fact discovery from July 25, 2008 until September 23, 2008 as well as a corresponding 60 day enlargement of the additional dates as set forth in the Scheduling Order dated February 15, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,


Johana Castro (JC 1809)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: BY FAX
(212) 763-5001
Kennisha Austin, Esq.
Emery Celli Brinckerhoff & Abady, LLP
75 Rockefeller Plaza, 20th Floor
New York, NY 10019

*The parties may extend
discovery on consent so
long as the Pretrial
Order is filed no later
than February 27,
2009. There shall be
no extension of this
date.*

Amine C. Xe
July 21, 2008